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VIA ECF

September 5, 2018

The Honorable Michael A. Hammer, U.S.M.J.
 United States District Court
 Martin Luther King, Jr. Federal Building
 50 Walnut Street
 Newark, New Jersey 07102

Re: *Celgene Corporation v. Hetero Labs Limited, et al.*
Civil Action No. 17-3387 (ES)(MAH)

Dear Judge Hammer:

This firm, together with Quinn Emanuel and Jones Day, represents Plaintiff Celgene Corporation ("Celgene") in the above-captioned matter. We write on behalf of Celgene and defendants Mylan Pharmaceuticals Inc., Mylan Inc., and Mylan N.V. (collectively, "the Mylan Defendants") to respectfully request an extension of the venue discovery schedule. The parties are continuing to meet and confer, mindful of some availability issues that may arise because of the upcoming Jewish holidays, in an effort to reach a compromise that would avoid the need for court intervention. Accordingly, Celgene and the Mylan Defendants have agreed to the following modifications of the venue discovery schedule:

	Event	Current Date	Revised Date
1	Submit venue-related discovery Protective Order or submit unresolved disputes to the Court.	September 5, 2018	September 21, 2018
2	The Mylan Defendants to serve any objections and responses to Celgene's venue-related discovery.	September 6, 2018	September 24, 2018
3	Celgene and the Mylan Defendants to meet and confer regarding any venue-related discovery disputes.	On or before September 13, 2018	On or before September 28, 2018

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4	<p>Celgene and the Mylan Defendants to present any unresolved disputes to the Court.</p> <p>The parties shall file a joint letter limited to 10 double-spaced pages per side.</p>	October 4, 2018	October 18, 2018
5	Deadline for substantial completion of document production and supplemental responses to written discovery.	October 18, 2018	November 1, 2018
6	Close of venue-related discovery.	The later of November 30, 2018 or 45 days after the resolution of any venue-related discovery disputes presented to the Court	The later of December 13, 2018 or 45 days after the resolution of any venue-related discovery disputes presented to the Court
7	<p>The Mylan Defendants may renew their Venue-Related Challenge relying only on evidence produced during venue-related discovery and may not rely on new declarations or evidence, with the exception that in their reply, the Mylan Defendants may also respond to evidence provided by Celgene in Celgene's opposition. For purposes of this litigation only, if the Mylan Defendants do not renew their Venue-Related Challenge within 28 days of the completion of venue-related discovery, the Mylan Defendants shall be deemed to have waived any defense or arguments under Fed. R. Civ. P. 12(b)(3) or Title 28, Chapter 87 of the United States Code.</p>	Within 59 days of the completion of venue-related discovery unless extended by the Court.	Within 59 days of the completion of venue-related discovery unless extended by the Court.

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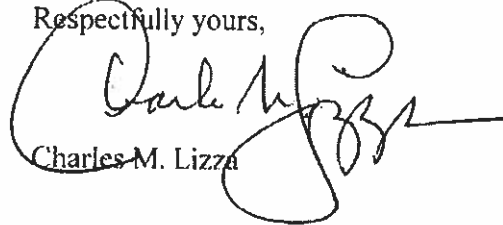
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If this meets with the Court's approval, we respectfully request that Your Honor execute the below form of endorsement and have it entered on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,



Charles M. Lizza

cc: All Counsel of Record (via ECF and e-mail)

SO ORDERED:



Hon. Michael A. Hammer, U.S.M.J.

9/10/2018